

SE-17

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

**MOHAMMED ABDUL RASHEED QURAISHI,
MOHAMMED ABDUL QAYIUM QURAISHI and
MOHAMMED ABDUL AZIZ QURAISHI**

CASE NO. 04-10345-NMG

VIOLATIONS:

**8 U.S.C. §1324 --
Encouraging and Inducing
Aliens to Come To, Enter
and Reside in the United
States in Violation of Law**

**18 U.S.C. §1512(b)(3) --
Witness Tampering**

**18 U.S.C. §2 --
Aiding and Abetting**

INDICTMENT

COUNT ONE: (8 U.S.C. § 1324(a)(1)(A)(iv) – Encouraging and Inducing Aliens to Come to, Enter and Reside in the United States in Violation of Law)

The Grand Jury charges that:

From in or about July, 2003 through in or about December, 2003, in the District of Massachusetts, and elsewhere

MOHAMMED ABDUL RASHEED QURAISHI,

the defendant herein, did encourage and induce an alien, to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was or would be in violation of law.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv) and Title 18, United States Code, Section 2.

COUNT TWO: (8 U.S.C. § 1324(a)(1)(A)(iv) – Encouraging and Inducing Aliens to Come to, Enter and Reside in the United States in Violation of Law)

The Grand Jury further charges that:

From in or about June, 2002 through in or about October, 2004, in the District of Massachusetts, and elsewhere

MOHAMMED ABDUL AZIZ QURAISHI,

the defendant herein, did encourage and induce an alien, to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was or would be in violation of law.

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv) and Title 18, United States Code, Section 2.

COUNT THREE: (8 U.S.C. § 1324(a)(1)(A)(iv) – Encouraging and Inducing Aliens to Come to, Enter and Reside in the United States in Violation of Law and for Commercial Advantage)

The Grand Jury further charges that:

From in or about December, 2003 through in or about October, 2004 in the District of Massachusetts, and elsewhere

MOHAMMED ABDUL QAIYUM QURAISHI,

the defendant herein, did, for the purpose of commercial advantage and private financial gain, encourage and induce an alien, to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was or would be in violation of law.

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv), (a)(1)(B)(i) and Title 18 United States Code, Section 2.

COUNT FOUR: (18 U.S.C. § 1512(b)(3) – Witness Tampering)

The Grand Jury further charges that:

From in or about June, 2004 through in or about October, 2004, in the District of
Massachusetts,

MOHAMMED ABDUL AZIZ QURAISHI,

the defendant herein, did attempt to corruptly persuade another person, with intent to hinder,
delay, and prevent communication to a law enforcement officer of the United States of
information related to the commission or possible commission of a federal offense.

All in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT FIVE: (18 U.S.C. § 1512(b)(3) – Witness Tampering)

The Grand Jury further charges that:

From in or about September, 2004 through in or about October, 2004, in the District of Massachusetts,

MOHAMMED ABDUL QAYTUM QURAISHI,

the defendant herein, did attempt to corruptly persuade another person, with intent to hinder, delay, and prevent communication to a law enforcement officer of the United States of information related to the commission or possible commission of a federal offense.

All in violation of Title 18, United States Code, Section 1512(b)(3).

FORFEITURE ALLEGATION: 18 U.S.C. 982(a)(6)-- Criminal Forfeiture

The Grand Jury further alleges that:

As a result of committing one or more of the offenses alleged in Counts One, Two and Three of this Indictment, charging encouraging and inducing aliens to come to, enter, and reside in the United States, knowing or in reckless disregard of the fact that such coming to, entry, and residence was or would be in violation of law, in violation of 8 U.S.C. §1324(a)(1)(A)(iv):

MOHAMMED ABDUL AZIZ QURAISHI and

MOHAMMED ABDUL RASHEED QURAISHI,

defendants herein, upon conviction, shall forfeit to the United States, pursuant to 18 U.S.C. §982(a)(6)(A), any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and any property real or personal that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; or that is used to facilitate, or is intended to be used to facilitate the commission of the offense.

1. Such property includes, but is not limited to, the following:

(a) The real property located at 80 Walnut Street, Unit 401, Canton Massachusetts 02021, more specifically described in the deed recorded on September 25, 2000, in the Norfolk County registry of deeds, book 14423, page 104;

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

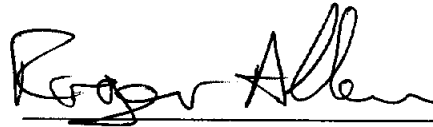
it is the intent of the United States, pursuant to 21 U.S.C. §853(p), as incorporated by 18 U.S.C. §982(b), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property,

Such property includes, but is not limited to:

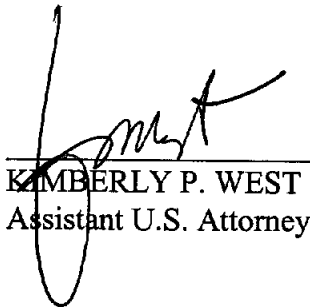
the real property located at 38 Kevin Clancy Way, Stoughton, Massachusetts, more fully described in the deed recorded at Book 15017, Page 403 of the Norfolk County Registry of Deeds, in the name of Abdul A. Quiraishi,

All in accordance with Title 18, United States Code, Section U.S.C. 982(a)(6) and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL



FOREPERSON OF GRAND JURY



KIMBERLY P. WEST
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS, Boston, November 18, 2004 @ 2:16 PM

Returned into the District Court by the Grand Jurors and filed.


Deputy Clerk

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency ICE

City Canton Related Case Information:

County Norfolk Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number 04-1803-CBS
R 20/R 40 from District of _____

Defendant Information:

Defendant Name Mohammed Abdul Aziz Quraishi Juvenile ☐ Yes ☒ No

Alias Name _____

Address 38 Kevin Clancy Way, Stoughton, MA

Birth date: 1965 SS#: ---- -- 0877 Sex: M Race: _____ Nationality: Indian

Defense Counsel if known: Bill Brown Address: 31 Milk Street
Boston, MA 02109

Bar Number: _____

U.S. Attorney Information:

AUSA Kim West Bar Number if applicable _____

Interpreter: ☐ Yes ☒ No List language and/or dialect: _____

Matter to be SEALED: ☒ Yes ☐ No

☒ Warrant Requested ☐ Regular Process ☐ In Custody

Location Status:

Arrest Date: _____

☐ Already in Federal Custody as _____ in _____

☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial

☐ On Pretrial Release: Ordered by _____ on _____

Charging Document: ☐ Complaint ☐ Information ☒ Indictment

Total # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 11/18/04 Signature of AUSA: [Signature]

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy _____)

Name of Defendant Mohammed Abdul Aziz Quaraishi

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>8 U.S.C. § 1324(a)(1)(A)(iv)</u>	<u>encourag. inducing alien to reside in U.S.</u>	<u>2</u>
Set 2	<u>18 U.S.C. § 1512(b)(3)</u>	<u>witnes tampering</u>	<u>4</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: _____ Category No. II Investigating Agency ICECity Canton Related Case Information:County Norfolk Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number 04-1803-CBS
R 20/R 40 from District of _____**Defendant Information:**Defendant Name Mohammed Abdul Qayyum Quraishi Juvenile ☐ Yes ☒ NoAlias Name a/k/a Mohammed AQ Quraishi, a/k/a Qaiyum Quraishi, a/k/a Mohammed Q. QuraishiAddress 38 Kevin Clancy Way, Stoughton, MABirth date: -/-/66 SS#: ----- 8009 Sex: M Race: _____ Nationality: IndianDefense Counsel if known: Bill Brown Address: 31 Milk StreetBoston, MA 02109

Bar Number: _____

U.S. Attorney Information:AUSA Kim West Bar Number if applicable _____Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: _____

☐ Already in Federal Custody as _____ in _____☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 2

Continue on Page 2 for Entry of U.S.C. Citations

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JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy _____)

Name of Defendant Mohammed Abdul Qayium Quaraishi

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>8 U.S.C. § 1324(a)(1)(A)(iv)</u>	<u>encourag. inducing alien to reside in U.S.</u>	<u>3</u>
Set 2	<u>18 U.S.C. § 1512(b)(3)</u>	<u>witness tampering</u>	<u>5</u>
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: _____ Category No. II Investigating Agency ICECity Canton Related Case Information:County Norfolk Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number 04-1803-CBS
R 20/R 40 from District of _____**Defendant Information:**Defendant Name Mohammed Abdul Rasheed Quaraishi Juvenile ☐ Yes ☒ NoAlias Name a/k/a Rasheed Quaraishi, a/k/a Mohammed AR Quaraishi,Address unknownBirth date: 1971 SS#: — — 3173 Sex: M Race: _____ Nationality: IndianDefense Counsel if known: Bill Brown Address: 31 Milk Street
Boston, MA 02109

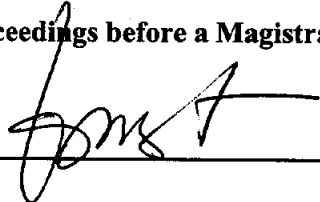
Bar Number: _____

U.S. Attorney Information:AUSA Kim West Bar Number if applicable _____Interpreter: ☐ Yes ☒ No List language and/or dialect: _____Matter to be SEALED: ☒ Yes ☐ No☒ Warrant Requested ☐ Regular Process ☐ In Custody**Location Status:**

Arrest Date: _____

☐ Already in Federal Custody as _____ in _____☐ Already in State Custody _____ ☐ Serving Sentence ☐ Awaiting Trial☐ On Pretrial Release: Ordered by _____ on _____Charging Document: ☐ Complaint ☐ Information ☒ IndictmentTotal # of Counts: ☐ Petty _____ ☐ Misdemeanor _____ ☒ Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

☒ I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 11/18/04Signature of AUSA: 

JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse

District Court Case Number (To be filled in by deputy _____)

Name of Defendant Mohammed Abdul Rasheed Quaraishi

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>8 U.S.C. § 1324(a)(1)(A)(iv)</u>	<u>encourag. inducing alien to reside in U.S.</u>	<u>1</u>
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

